

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re: :
THE FINANCIAL OVERSIGHT AND : PROMESA
MANAGEMENT BOARD FOR PUERTO RICO, : Title III
: Case No. 17 BK 3283-LTS
as representative of :
: (Jointly Administered)
THE COMMONWEALTH OF PUERTO RICO, *et* :
al., : This filing relates to HTA and
Debtors : ERS.
:

**RESPONSE TO THIRTY-NINTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF
THE PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY AND THE
EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO TO DEFICIENT CLAIMS**

I would like to file a formal response to the Omnibus Objection for case: 17-03283-LTS. I, Joe M. Pace (as shown in item 66, on page 10 of exhibit A- Deficient), am the owner of the referenced Employees Retirement System of the Government of the Commonwealth of Puerto Rico bonds that are subject to case number 17 BK 03566-LTS, Claim # 5427. I have owned the subject bonds in my personal investment account since January of 2013.

According to Exhibit A of the Thirty - Ninth Omnibus Objection, the Proof of claim purports to assert liabilities associated with bond(s) and/or money loaned, but fails to provide any basis or supporting documentation for asserting a claim against ERS, such that Debtors are unable to determine whether claimant has valid claim against ERS or and of the other Title III debtors.

As noted above, I have owned the referenced bonds since January 2013, and continue to own said bonds. I have attached for your reference the original trade confirmation along with a portion of my most recent brokerage statement which demonstrates continued ownership of the bonds.

As you have requested, I have served the Court of Clerk's office, the Oversight Board, and Creditors' Committee, via Federal Express, at the following addresses:

Clerk's Office
United States District Court
Room 150 Federal Building
San Juan, Puerto Rico 00918-1767

Counsel for the Oversight Board
Proskauer Rose LLP
Eleven Time Square
New York, New York 10036-8299
Attn: Martin J. Bienentock

2019 JUN 26 PM 2:15

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U.S. DISTRICT COURT
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Counsel for the Creditor's Committee

Paul Hastings LLP
200 Park Avenue
New York, New York 10166
Attn: Luc A. Despins
James Bliss
James Worthington
G. Alexander Bongartz

Please let me know if any additional documentation is necessary. I can be reached using the contact information below.

Sincerely,



Joe M. Pace
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Potomac Maryland 20854
301-526-6718
Joepace3@gmail.com